



Ian Cross <ian@lawinannarbor.com>

William Kelly v. Corizon Health, Inc

Nicholas B. Pillow <npillow@chapmanlawgroup.com>

Wed, Jul 20, 2022 at 3:04 PM

To: Ian Cross <ian@lawinannarbor.com>, Jonathan Lanesky <jlanesky@chapmanlawgroup.com>, Larry Margolis <larry@lawinannarbor.com>

Cc: Elizabeth Smith <esmith@chapmanlawgroup.com>

Ian

We would be happy to set up a time to talk discovery in the next week or so, please let us know some days that work for you.

At to the motion to substitute parties, we cannot agree to the substitution as it is our understanding that all liabilities related to terminated contracts, like the MDOC contract, were allocated to Corizon Health Inc. in the corporate restructuring and therefore Corizon Health Inc. remains the proper party in interest related to Plaintiff's *Monell* claims. Please advise whether you will withdraw your motion based on that information.

Best

Nick

From: Ian Cross <ian@lawinannarbor.com>**Sent:** Wednesday, July 20, 2022 2:50 PM**To:** Jonathan Lanesky <jlanesky@chapmanlawgroup.com>; Nicholas B. Pillow <npillow@chapmanlawgroup.com>; Larry Margolis <larry@lawinannarbor.com>**Subject:** Re: William Kelly v. Corizon Health, Inc

Jonathan and Nicholas,

Please let us know when you are available to discuss these responses. Judge Berg requires a phone conference before a party can request leave to file a discovery motion. The documents sought are going to be relevant to our claims against the individual defendants regardless of the outcome of your motion for sanctions. If parties other than Mr. Kelly are discussed in the emails, you can redact the names.

Additionally, we are going to be filing a motion to substitute parties in this case, similar to the one we filed today in the Jackson case (attached). Please let me know if you will concur in the relief sought.

Thanks,

Ian



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On Fri, Jul 8, 2022 at 5:03 PM Elizabeth Smith <esmith@chapmanlawgroup.com> wrote:

Good afternoon,

Attached please find the Corizon Defendants Responses to Plaintiff's Discovery Requests.

Thank you for your attention to this matter.

Best Regards,

Elizabeth

ELIZABETH SMITH | Paralegal

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